

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**TQ DELTA, LLC,
Plaintiff,**

V.

COMMScope Holding Company, Inc., Commscope Inc., Arris International Limited, Arris Global Ltd., Arris US Holdings, Inc., Arris Solutions, Inc., Arris Technology, Inc., and Arris Enterprises, LLC,

**NOKIA CORP., NOKIA SOLUTIONS
AND NETWORKS OY, and NOKIA OF
AMERICA CORP.**

Defendants.

JURY TRIAL DEMANDED

Civil Action 2:21-cv-310-JRG
(Lead Case)

Civil Action No. 2:21-cv-309-JRG
(Member Case)

DECLARATION OF EDWARD CHIN

I, Edward Chin, hereby declare as follows:

1. I am a member of the Texas State Bar admitted to appear before this Court, and I am Of Counsel with The Davis Firm, P.C., counsel of record for plaintiff TQ Delta, LLC (“TQ Delta”) in this lawsuit. I submit this declaration based on personal knowledge and following a reasonable investigation. If called upon as a witness, I could competently testify to the truth of each statement herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpted pages from the redacted Expert Report of Jonathan D. Putnam, dated November 2, 2018, in *TQ Delta, LLC v. 2Wire, Inc.*, Civ. Action No. 13-1835-RGA, pending in the District of Delaware.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Claim Construction Order for Family 9 Patents, dated May 15, 2018, in *TQ Delta, LLC v. ZyXEL Communications, Inc., et al.*, Civ. Action No. 13-2013-RGA, *TQ Delta, LLC v. Adtran, Inc.*, Civ. Action No. 14-cv-954-RGA, and *Adtran, Inc. v. TQ Delta, LLC*, Civ. Action No. 15-cv-121-RGA, in the District of Delaware.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Defendants' Preliminary Constructions and Identification of Extrinsic Evidence [Patent Rule 4-2], dated March 3, 2022, in this litigation.

Executed on the 7th day of March 2022, at Southlake, Texas.

/s/ Edward Chin
EDWARD CHIN